## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS WICHITA FALLS DIVISION

RUMBLE, INC.;	
RUMBLE USA INC.; and	)
RUMBLE CANADA INC.,	)
	)
Plaintiffs,	)
	)
v.	) Civil Action No. 7:24-cv-00115-K
	)
WORLD FEDERATION OF	)
ADVERTISERS; DIAGEO PLC;	)
WPP PLC; and GROUPM	)
WORLDWIDE, INC.,	)
	)
Defendants.	

## MOTION TO PROCEED WITHOUT LOCAL COUNSEL

Defendants WPP PLC and GroupM Worldwide, Inc., seek leave of the Court to proceed without local counsel. Good cause exists for this request. The undersigned counsel resides in and has his law license in Texas but does not live within 50 miles of the Wichita Falls Division courthouse. Counsel is familiar with the Wichita Falls Division and this Court's local rules. Counsel is able to attend any hearing scheduled by the Court and would be present even if local counsel were required. Defendants WPP PLC and GroupM Worldwide, Inc., respectfully ask that the Court permit them to proceed without additional counsel.

## **CONCLUSION**

For the foregoing reasons, Defendants WPP PLC and GroupM Worldwide, Inc., request that the Court grant the motion to proceed without local counsel.

Dated: November 3, 2024 Respectfully submitted.

<u>/s/ Todd Disher</u> Todd Disher

Steven P. Lehotsky\*
LEHOTSKY KELLER COHN LLP
200 Massachusetts Avenue, NW
Washington, DC 20001
(512) 693-8350
steve@lkcfirm.com

Andrew B. Davis\*
Texas Bar No. 24082898
Todd Disher
Texas Bar. No. 24081854
Lehotsky Keller Cohn LLP
408 W. 11st Street, 5th Floor
Austin, TX 78701
(512) 693-8350
andrew@lkcfirm.com
todd@lkcfirm.com

Drew F. Waldbeser\*
LEHOTSKY KELLER COHN LLP
3280 Peachtree Road NE
Atlanta, GA 30305
(512) 693-8350
drew@lkcfirm.com

<sup>\*</sup> Pro hac vice motion forthcoming

Attorneys for Defendant WPP PLC and GroupM Worldwide, Inc.

## **CERTIFICATE OF SERVICE**

I certify that on November 3, 2024, the foregoing document was filed using the Court's CM/ECF system, which constitutes service to all attorneys of record who have registered for CM/ECF updates.

<u>/s/ Todd Disher</u> Todd Disher